

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIE DAVIS, JR., *et al.*,

Plaintiff,

v.

MOUNTAIRE FARMS, INC., *et al.*

Defendants.

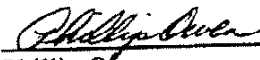
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Civil Action No. 04-414


AFFIDAVIT OF PHILLIP OWEN

COMES NOW Phillip Owen, who being duly sworn according to law, hereby
deposes and says:

1. I am over twenty-one years of age, of sound mind, and in all respects
qualified to make this Affidavit. I have personal knowledge of the facts stated herein.
2. I am Human Resources Director for Mountaire Farms, Inc.
3. In 2004 the average wage for the Crew Leaders was \$41,636. Other
Mountaire front line supervisors such as the Tray Pack Foreman, Water Treatment
Manager, Shipping/Cooler Foreman, Security Manager, and Quality Assurance
Supervisor received an average wage of \$38,244 in 2004. The Chicken Catchers were
paid on a piece-rate basis and received on average \$29,161.70 on an annual basis.


Phillip Owen

SWORN TO AND SUBSCRIBED before me, a Notary Public for the State and
County aforesaid, this 27th day of April, 2005.


Notary Public
My Commission Expires:

DEBRA L. JACKSON
NOTARY PUBLIC
STATE OF DELAWARE
COMMISSION EXPIRES 3/15/09

